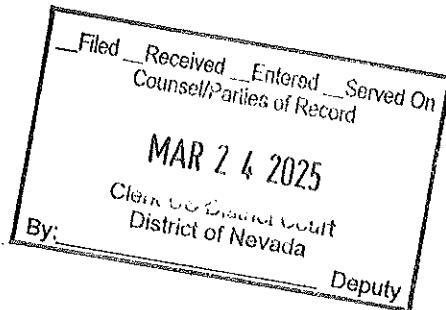


1 **EXHIBIT 6**

2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**

4 **DREW J. RIBAR, Pro Se Plaintiff**
5 3480 Pershing Ln
6 Washoe Valley, NV 89704
(775) 223-7899
7 Const2Audit@gmail.com



8 vs.

9 **WASHOE COUNTY, et al.**

10
11 **Defendants.**

12
13
14 **Case No.: 3:24-cv-00526-ART-CLB**

15
16 **EXHIBIT 6**

17
18 **Title:** Internal Communications Between Washoe County Library System and Build Our Center,
19 Inc. Regarding Drag Queen Story Hour (DQSH) and Event Promotion

20
21 **Date:** November 14-18, 2022

22
23 **Source:** Internal email correspondence among Washoe County Library System (WCLS) officials
24 and Build Our Center, Inc. (BOC) representatives

25
26 **Bates Number Range: EXH023 - EXH026**

27
28 **PLEADING TITLE - 1**

1 **DESCRIPTION**

2
3 This exhibit contains internal emails among Washoe County Library System (WCLS) officials
4 and Build Our Center, Inc. (BOC) representatives, including:

5

6 • **Jeff Scott** (Library Director, WCLS)
7 • **Jamie Hemingway** (Interim Public Information and Development Officer, WCLS)
8 • **Stacey Spain** (Programs and Operations Manager, BOC)
9 • **Angeline Peterson** (Board Member, BOC)

10
11 These communications reveal that:

12

13 1. **WCLS actively collaborated with BOC** to coordinate event messaging, social media
14 promotion, and outreach efforts for Drag Queen Story Hour (DQSH).

15 2. **BOC influenced WCLS's official statements**, proposing language and book
16 recommendations for the event, ensuring alignment with their organization's agenda.

17 3. **WCLS leadership, including Jeff Scott and Jamie Hemingway, directly worked with**
18 **BOC** to approve promotional materials and public messaging.

19 4. **BOC encouraged WCLS to issue statements related to Transgender Day of**
20 **Remembrance**, which WCLS adopted and promoted.

21 5. **WCLS demonstrated viewpoint discrimination** by favoring BOC's messaging while
22 restricting access to Plaintiff and other opposing voices.

23

24

25
26 **RELEVANCE TO CASE**

27
28 PLEADING TITLE - 2

1 **First and Fourteenth Amendment Claims**

2

3 • Demonstrates that **WCLS coordinated messaging with a private advocacy group**
4 **(BOC), creating unconstitutional entanglement between government and private**
5 **actors.**

6 • Establishes that **BOC dictated government speech, reinforcing viewpoint**
7 **discrimination and access restrictions violating the First Amendment (Rosenberger v.**
8 **Rector, 515 U.S. 819 (1995)).**

9

10 **Refutes BOC's Motion to Dismiss**

11

12 • Strengthens the argument that **BOC functioned as a state actor under Lugar v.**
13 **Edmondson Oil Co., 457 U.S. 922 (1982)** by playing a direct role in event planning and
14 public messaging.

15 • Proves that **BOC was not merely a private participant but an entity controlling**
16 **public events and speech.**

17

18 **Monell Liability Under 42 U.S.C. § 1983**

19

20 • Confirms that **Washoe County Library officials, including Jeff Scott and Jamie**
21 **Hemingway, exercised discretionary power favoring BOC, making Washoe County**
22 **liable under Monell v. Dept. of Social Services, 436 U.S. 658 (1978).**

23 • **BOC's influence over county-run events and public statements constitutes**
24 **unconstitutional entanglement, reinforcing Monell claims.**

1 **CERTIFICATE OF AUTHENTICITY**

2
3 I, **Drew J. Ribar**, hereby certify under penalty of perjury under the laws of the United States that
4 the attached exhibit is a **true and correct copy** of internal email communications obtained
5 through public records requests and presented as evidence in this case.

6
7 Executed on this **17th day of March 2025**.

8
9 **By:**

10 /s/ *Drew J. Ribar*
11 Drew J. Ribar, Pro Se
12 3480 Pershing Ln
13 Washoe Valley, NV 89704
14 (775) 223-7899
15 Const2Audit@gmail.com

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PLEADING TITLE - 4

From: Scott, Jeff <jscott@washoecounty.gov>
Sent: 18 November 2022 22:53
To: Hemingway, Jamie
Subject: Re: Drag Queen Storytime
Attachments:

Fantastic! Thank you!!

Jeff

Jeff Scott
Library Director | Washoe County Library System
jscott@washoecounty.gov | Office: 775.327.8340
301 S. Center Street, Reno, NV 89501

From: Hemingway, Jamie <JHemingway@washoecounty.gov>
Sent: Friday, November 18, 2022 2:52:13 PM
To: Scott, Jeff <jscott@washoecounty.gov>
Subject: Re: Drag Queen Storytime

Hi Jeff,

The post is in the works. I am working on writing the post copy, but you can take a look at the attached graphic that Jen Cole made. She put together a book list for this one.

If that looks good to you I'll get it scheduled for Sunday.

Thanks,

Jamie

EXH 023

Jamie Hemingway
Interim Public Information and Development Officer | Washoe County Library System
jhemingway@washoecounty.gov | Office: 775-327-8360
301 South Center Street, Reno, NV 89501

From: Scott, Jeff <jscott@washoecounty.gov>
Sent: Tuesday, November 15, 2022 2:52 PM
To: Hemingway, Jamie <JHemingway@washoecounty.gov>
Subject: FW: Drag Queen Storytime

Jamie,

I am going to try to meet with this group on Friday. Can we put some social media out about this event or something to commemorate the day on Sunday?

Thanks,

Jeff

Jeff Scott
Library Director
Washoe County Library System
301 S. Center St. Reno, NV 89501
jscott@washoecounty.us
(775)327-8340

From: Stacey Spain <stacey@ourcenterreno.org>
Sent: Tuesday, November 15, 2022 10:09 AM
To: Angeline Peterson <angelinempeterson@gmail.com>
Cc: Scott, Jeff <jscott@washoecounty.gov>
Subject: Re: Drag Queen Storytime

[**NOTICE:** This message originated outside of Washoe County -- **DO NOT CLICK** on links or open attachments unless you are sure the content is safe.]

Hi Jeff!

Thanks so much for opening this dialogue with us! I am wide open anytime tomorrow or Friday morning. This Sunday is Transgender Day of Remembrance so any notice of the day or list of events happening in the community would be so welcome. UUFNN is having a vigil at 6 pm.

On Mon, Nov 14, 2022 at 4:12 PM Angeline Peterson <angelinempeterson@gmail.com> wrote:

Thank you so much for your reply! I am so grateful that our library system is so open and accepting, and continues to find ways to reach out to our diverse community. I would love to discuss potential partnerships with you. I have included Stacey Spain, Our Center's Programs and Operations Manager,

EXH 024

who is a wealth of knowledge and creativity.

I am very available tomorrow or most afternoons for the rest of the week. I am looking forward to speaking with you!

All the best,
Angeline Peterson

On Mon, Nov 14, 2022 at 4:06 PM Scott, Jeff <[>](mailto:jscott@washoecounty.gov); wrote:
Thank you for reaching out and for your support.

We would love to find a way to partner. Let me know if you have some time to meet and discuss this.

We are working on DEI initiatives at the library with Tiffany Young. Our next steps are to review our events to ensure we are holding enough events to ensure everyone feels welcome at the library. I would love to talk to get your feedback and ideas.

Thank you again for your support.

Sincerely

Jeff

 Jeff Scott
Library Director | Washoe County Library System
[](mailto:jscott@washoecounty.gov) | Office: 775.327.8340
301 S. Center Street, Reno, NV 89501

From: Angeline Peterson <[>](mailto:angelinempeterson@gmail.com)
Sent: Monday, November 14, 2022 3:58 PM
To: Scott, Jeff <[>](mailto:jscott@washoecounty.gov)
Subject: Drag Queen Storytime

[NOTICE: This message originated outside of Washoe County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Good afternoon Mr. Scott,

My name is Angeline Peterson and I have lived in the Reno/Sparks area my entire life. As a proud member of the Board of Our Center, northern Nevada's only LGBTQ+ community center, I want to express to you how much joy drag queen storytime brings to our community. Not only is it a way for children to be introduced to drag, but it gives them an opportunity to get to know folks who they otherwise wouldn't likely meet. Allowing for children to expand their minds at such young ages encourages acceptance of themselves, their families and friends, and of the world in general.

I was lucky enough to attend the first drag queen storytime at the Sparks library and I was so impressed by the turnout. With few exceptions, the crowd was enthusiastic, joyous, and excited to be there.

EXH025

I hope you will continue to see the good in these events and continue them in the face of naysayers. Should you ever want to partner with Our Center, I would be happy to connect with you and make more magic happen.

All the best,

--
Angeline M. Peterson
Operations Executive Administrator, StemExpress
Education Advisor, Kappa Alpha Theta, Beta Mu Chapter
Board Member, Our Center
775.848.4987
Preferred pronouns: she/her/hers

--
Angeline M. Peterson
Operations Executive Administrator, StemExpress
Education Advisor, Kappa Alpha Theta, Beta Mu Chapter
Board Member, Our Center
775.848.4987
Preferred pronouns: she/her/hers

--
Stacey Spain
Programs and Operations Manager
She/Her/Hers
1745 S. Wells Avenue • Reno, NV 89502
PO Box 54 • Reno, NV 89504
Phone: 775.624.3720 • Direct: 775.624.3716
Stacey@OurCenterReno.org

EXH026